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10 Attorneys for Defendant
11 COSTCO WHOLESALE CORPORATION

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 JAYASHREE SINGH,
19 Plaintiff,
20 vs.
21 COSTCO WHOLESALE CORPORATION,
22 and DOES 1 TO 50,
23 Defendants.

24 No. 5:20-cv-08180-NC

25 **DECLARATION OF ERAN S. FORSTER
IN SUPPORT OF DEFENDANT'S
NOTICE OF MOTION AND MOTION
FOR SUMMARY JUDGMENT**

26 **DATE: May 31, 2023
TIME: 1:00pm**

27 **JUDGE NATHANAEL COUSINS**

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18 **DECLARATION OF ERAN S. FORSTER, ESQ.**

19 I, Eran S. Forster, Esq., declare and state as follows:

20 1. I am an associate of the Law Firm Ford, Walker, Haggerty & Behar, LLP, attorneys of record
21 for Defendant Costco Wholesale Corporation (hereinafter, "Costco").

22 2. I have substantial responsibility for this case and have reviewed the file in this matter. I have
23 personal knowledge of the following and, if sworn as a witness, could and would competently testify
24 thereto, under oath.

25 3. Attached in support of Costco's Motion for Summary Judgment are true and correct copies of
26 Declarations of Jonathan Eric von Delden, an Assistant General Manager at Costco; and Jorge Molina,
27 a Front-End Manager at Costco.

1 4. Attached as **Exhibit “A”** is a Transcript from the Deposition of Plaintiff Jayashree Singh that
2 was held on September 29, 2022;

3 5. Attached as **Exhibit “B”** is the Declaration of Jorge Molina;

4 6. Attached as **Exhibit “C”** are Photographs taken from September 4, 2022, and authenticated by
5 Jorge Molina in Exhibit B para. 8;

6 7. Attached as **Exhibit “D”** is a true and correct copy of the Video captured on September 4, 2022
7 of the food court at Costco Food Court;

8 8. Attached as **Exhibit “E”** is the Declaration of Jonathan Eric von Delden;

9 9. Attached as **Exhibit “F”** are Screenshots of Video (Exhibit D) capturing the Safety Inspection;

10 10. Attached as **Exhibit “G”** are Costco’s Floor Walk and Safety Sheet dated September 4, 2022,
11 and authenticated by Jonathan Eric von Delden in Exhibit E para. 7;

12 11. Attached as **Exhibit “H”** are Screenshots of Video (Exhibit D) capturing Jorge Molina;

13 12. Attached as **Exhibit “I”** are Screenshots of Video (Exhibit D) capturing Costco customer, soda
14 and shopping cart;

15 13. Attached as **Exhibit “J”** are Screenshots of Video (Exhibit D) capturing Costco customer and
16 soda;

17 14. Attached as **Exhibit “K”** are Screenshots of Video (Exhibit D) capturing plaintiff’s slip and fall.

18 Dated: April 21, 2023

FORD, WALKER, HAGGERTY & BEHAR, LLP

19 By: /S/ Eran S. Forster

20 ARTHUR J. CASEY

21 ERAN S. FORSTER

22 Attorneys for Defendant

23 COSTCO WHOLESALe CORPORATION

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